

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

**In Re: AUTOMOTIVE PARTS  
ANTITRUST LITIGATION**

Master File No. 12-md-02311  
Honorable Marianne O. Battani

**In Re: All Auto Parts Cases**

2:12-MD-02311-MOB-MKM

**THIS DOCUMENT RELATES TO:  
ALL AUTO PARTS CASES**

## Oral Argument Requested

**DEFENDANTS' MOTION FOR LEAVE TO FILE A REPLY BRIEF OF UP TO 23  
PAGES IN SUPPORT OF THEIR MOTION TO COMPEL DISCOVERY FROM NON-  
PARTY ORIGINAL EQUIPMENT MANUFACTURERS**

Pursuant to Local Rule 7.1(d)(3), Defendants, by their undersigned counsel, hereby move for leave to file a reply brief of up to 23 pages in support of their Motion to Compel Discovery from Non-Party Original Equipment Manufacturers (“OEMs”).

On February 19, 2016, the Specified Subpoenaed Entities (“SSEs”) filed five separate briefs in opposition to the Parties’<sup>1</sup> Motions to Compel Discovery from Non-Party OEMs as follows: 1) Joint Opposition Brief (40 pages); 2) Small SSE Opposition Brief (12 pages); 3) Domestic Distributor Opposition Brief (10 pages); 4) Truck & Equipment Opposition Brief (4 pages); and 5) Non-Core SSE Opposition Brief (13 pages).<sup>2</sup> The opposition briefs are collectively 79 pages long. In addition, a plethora of declarations and other exhibits were filed in

<sup>1</sup> The Parties consist of End Payor Plaintiffs, Automobile Dealer Plaintiffs, Truck and Equipment Dealer Plaintiffs, the State of Florida, the State of Indiana, and all Defendants in the Automotive Parts Antitrust Litigation, No. 2:12-md-02311-MOB-MKM (E.D. Mich.).

<sup>2</sup> The SSEs that joined one or more of the opposition briefs are listed in The Specified Subpoenaed Entities' Motion to Exceed Page Limits. *See In re Auto. Parts Antitrust Litig.*, Case No. 2:12-md-02311-MOB-MKM (E.D. Mich. Feb. 19, 2016), ECF No. 1225, FN 1.

connection with these briefs, including 76 exhibits filed in connection with the Joint Opposition Brief alone.

The drafting of Defendants' reply brief involved the coordination of many law firms, representing Defendants in thirty-two sets of complex antitrust actions involving thirty-two different vehicle parts. It also required Defendants to respond to five separate briefs with a large number of declarations and exhibits, filed by several different groups of SSEs that asserted varying arguments and individualized interests, all of which oppose the production of important discovery sought by Defendants. Despite these obvious obstacles, Defendants endeavored to file one joint reply brief for efficiency purposes and to preserve the resources of the parties and the Court.

If Defendants chose to file a separate reply brief in response to each of the five opposition briefs, they would be entitled to a total of 25 pages in light of the 5-page limit imposed by Judge Battani's Practice Guidelines. Further, Defendants recognize that the Court has granted similar motions to extend page limits in this case previously, *In re Auto. Parts Antitrust Litig.*, No. 2:12-cv-00103-MOB-MKM (E.D. Mich. Aug. 27, 2015), ECF No. 336, and the Defendants agreed to a similar extension for the SSEs' briefs in opposition to the instant motion. Not only did the SSEs seek leave to file excess pages, but they also sought leave to file five separate briefs, with the Joint Opposition Brief being 40 pages alone (double what is permitted by Judge Battani's Practice Guidelines). *See In re Auto. Parts Antitrust Litig.*, Case No. 2:12-md-02311-MOB-MKM (E.D. Mich. Feb. 19, 2016), ECF No. 1225. Defendants did not oppose this motion.

Given the number of opposition briefs filed, the total number of subpoenaed entities, the various subsets of subpoenaed entities with differing arguments and positions, the legal issues

implicated, and the importance of the discovery sought, Defendants were unable to file one 5 page reply brief without sacrificing accuracy or clarity.

For these reasons, Defendants respectfully request that the Court enter an Order granting leave to file a reply brief of up to 23 pages.

Dated: March 11, 2016

Respectfully submitted,

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I hereby certify that on March 11, 2016, I caused the foregoing Defendants' Motion For Leave To File a Reply Brief of 23 pages in support of their Motion to Compel Discovery From Non-Party Original Equipment Manufacturers to be served on the non-parties via FedEx. The foregoing materials were also electronically filed with the Clerk of the Court using the CM/ECF system, which will send notifications of such filings to the Parties' counsel of record.

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